

Steve Wilson Briggs
 681 Edna Way
 San Mateo, CA 94402
 510 200 3763
 snc.steve@gmail.com
 PLAINTIFF In Propria Persona

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

STEVE WILSON BRIGGS
 Plaintiff,
 vs
 UNIVERSAL PICTURES, et al.,
 Defendants.

Civ No: CV 17 6552 VC

**DECLARATION OF STEVE WILSON
 BRIGGS, IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 SANCTIONS, AGAINST
 THE DEFENSE COUNSEL**

Judge: The Honorable Vince Chhabria
 Date: February 15th, 2018
 Time: 10:00 a.m.
 Courtroom: 4

DECLARATION OF STEVE WILSON BRIGGS

As required by Civil Local Rule 7-2(D) of the United States District Court Northern District Of California, plaintiff Steve Wilson Briggs submits the attached declaration in support of his motion for sanctions (captioned: Plaintiff's Notice Of Motion, And Motion For Sanctions, Against The Defense Counsel, And Memorandum Of Points And Authority), submitted on January 6, 2018. The declaration is attached and begins on the following page.

Dated: January 7, 2018 Respectfully Submitted,

By: /s/ Steve Wilson Briggs

Steve Wilson Briggs

Plaintiff, In Propria Persona

DECLARATION OF STEVE WILSON BRIGGS

I, Steve Wilson Briggs, declare the following:

- I am the Plaintiff in the matter of Briggs v Universal Pictures, et al, CV176552-VC.
- On November 13th, 2017, I filed a lawsuit against the following defendants: Universal Pictures; Sony Pictures; NBCUniversal; Kevin Spacey; Ariel (Ari) Emanuel; Matthew (Matt) Damon; Ben Affleck; Neill Blomkamp; Mordecai (Modi) Wiczky; Asif Satchu; Bill Block; Dana Brunetti; MRC, and all MRC entities and subsidiaries: (Media Rights Capital; MRC II LP; MRC II Distribution Company LP; MRC II Holdings, L.P.; Asgari Inc.; Oaktree Entertainment, Inc.; MRC I Hedge Co, LLC; MRC Sub Gp, LLC; MRC II Capital Company, L.P.; MRC I Project Company, LLC).
- That lawsuit accused the Defendants of the following violations: Conspiracy, Obstruction Of Justice; False Statements; Breach Of Contract; Fraud And False Statements; Deceit; Negligence; Gross Negligence; Violation Of California Labor Code § 1700.39; Violation Of Unfair Business Practices Act [Cal Bus & Prof Code § 17200, Et Seq.]; Perjury; Tampering With Evidence; Witness Tampering; Subornation Of Perjury.
- To the best of my knowledge, every accusation, statement and/or allegation in that Complaint is true.
- In response to my Complaint, the Defendants' attorneys (the Defense Counsel) submitted to the Court a **Motion To Dismiss** and Memorandum.
- In the Defendants' Motion To Dismiss, I found numerous violations of FRCP codes and or Rules. Thus, I submitted a Rule 11(c) Motion For Sanctions Against the Defense Counsel.
- To the best of my knowledge, all of the facts and allegations in that Motion For Sanction are true.

- Responsive to the Defendants' motion to dismiss, I also filed a First **Amended Complaint (FAC)**, accusing the Defendants of the following violations: Civil Conspiracy; Spoliation Of Evidence; Breach Of Contract; Fraud / Intentional Misrepresentations; Deceit; Concealment; Negligence; Gross Negligence; Violation Of California Labor Code § 1700.39; Violation Of Unfair Business Practices Act [Cal Bus & Prof Code § 17200, Et Seq.]; Witness Tampering; Infringing Exportation (17 Usc § 602, Under 17 Usc § 501); Copyright Infringement (17 U.S.C § 501).
- To the best of my knowledge all of the facts, allegations and information in that FAC are true.
- On the strength of all of this information, I believe the Court has sufficient cause to uphold the Plaintiff's motion, and impose such sanctions as the Court deems necessary.

I declare under penalty of perjury under the laws of the United State of America, that the foregoing is true and correct. Executed on the 7th day of January, 2018, in Santa Rosa, California.


Steve Wilson Briggs